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FCC Mail Room

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Services and Solutions for Successful Equipment and Hardware Retailers.

August 1, 2011

Marlene Dortch
Secretary
Federal Communications Commission
445 12 Street, SW
Washington, DC 20554

RE: IB Docket No. 11-109
Comments Regarding the LightSquared Technical Working Group Report

Dear Ms. Dortch:

SouthWestern Association (SWA) appreciates the opportunity to provide comments regarding the report of the Technical Working Group mandated by the Federal Communications Commission (FCC) and conducted jointly by LightSquared and the U.S. Global Positioning System (GPS) Industry Council (USGIC). There are significant negative impacts to our dealer members and the farmers and ranchers they serve if FCC decides to allow LightSquared to move forward on its proposal.

SWA represents and works with 700 retail agricultural, industrial and outdoor power equipment dealerships in the states of Kansas, Missouri, New Mexico, Oklahoma and Texas. Collectively, these dealerships employ approximately 15,000 people. It is on behalf of these members - and the dealerships we serve - that we submit these comments.

Our dealers are deeply concerned about the possible widespread disruption of GPS services that are used in precision agriculture should the FCC approve the LightSquared proposal. Equipment dealers across the territory we serve have invested millions of dollars in equipment and human resources (trained technicians) to maintain and service the current GPS system and the agricultural equipment it is attached to. The establishment of a network of base stations by LightSquared that would disrupt current GPS signals should not be allowed to happen.

We also know of no known "filters" that could be used in any type of retrofit to existing GPS units. This fact should cause concern to the FCC in giving any type of approval in either the upper or lower portions of the band spectrum LightSquared is attempting to utilize.

Our member's customers - farmers and ranchers - rely on these GPS receivers on farm implements to increase efficiency and profitability and at the same time provide environmentally friendly operations. To disrupt GPS signals would cause irreparable harm to agricultural profitability and would dramatically and negatively impact efforts in our industry to support clean air and clean water initiatives, raise production costs and consumer's prices for food, fiber, feed and fuel.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeff Flora'.

Jeff Flora
Chief Executive Officer

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USIABODE